



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:  
**SR-6J**

April 9, 2020

Mr. Paul Lake  
Division of Remediation Management  
Bureau of Land  
Illinois Environmental Protection Agency  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276

**Re: Planning for Transfer of Operation and Maintenance (O&M) Responsibilities  
Jennison-Wright Superfund Site, Granite City, Illinois**

Dear Mr. Lake:

This letter serves to document the transfer of responsibility that will take place later this year for the CERCLA groundwater restoration remedy (OU3) at the Jennison-Wright site in Granite City, Illinois. This letter also serves as a reminder that additional soil excavation is required per the 2009 Explanation of Significant Differences (ESD) and provides a summary of the recommendations in the 2019 Five-Year Review report.

Transfer of Responsibility Beginning September 29, 2020

The National Contingency Plan, 40 CFR §300.435(f)(3), states:

[F]or fund-financed remedial actions involving treatment or other measures to restore groundwater or surface water quality to a level that assures protection of human health and the environment, the operation of such treatment or other measures for a period of up to ten years after the remedy becomes operational and functional will be considered part of the remedial action. Activities required to maintain the effectiveness of such treatment or measures following the ten-year period, or after the remedial action is complete, whichever is earlier, shall be considered [operation and maintenance (O&M)].

Over the past ten years, Illinois EPA has operated the remedy at the Jennison-Wright site with funds obligated under the Jennison-Wright Superfund Cooperative Agreement V-96548001, originally awarded on October 1, 2004. The long-term response action (LTRA) period related to the groundwater remedy will end on September 28, 2020. Therefore, as required by CERCLA

§104(c)(3), site responsibility will transfer from U.S. Environmental Protection Agency (EPA) to Illinois EPA **beginning on September 29, 2020**. At that time the State will assume O&M activities at the Jennison-Wright site and will be responsible for implementing O&M until cleanup levels have been achieved.

At the end of the LTRA period, EPA will no longer have an interest in CERCLA-funded equipment that is considered an integral part of services to individuals, as per 40 CFR §§35.6325 and 35.6815. Pursuant to CERCLA §104(j)(2), as of September 29, 2020, Illinois EPA must accept transfer of any property interest that was originally acquired by EPA to conduct the remedial action. Subsequent disposal of such property by Illinois EPA must be made in accordance with 40 CFR §35.6815(b)(5). If Illinois EPA acquired property using federal money in order to conduct the remedial action, as has been the case at the Jennison-Wright site, disposition of the property must be made in accordance with applicable regulations in 40 CFR §35 Subpart O and the NCP.

#### Additional Work Required by 2009 ESD

The ESD signed by EPA in 2009 for the Jennison-Wright site required excavation of soil beneath 22<sup>nd</sup> Street. In the 1999 ROD, the excavation of soil beneath 22<sup>nd</sup> Street was not required because the street was to serve as a barrier to prevent direct contact with any contaminated soil. Since the ROD was signed, Granite City made the decision to close the section of 22<sup>nd</sup> Street adjacent to the site and to discontinue long-term maintenance of the street. For this reason, the 2009 ESD required excavation and off-site disposal of soil in two sections of 22<sup>nd</sup> Street. **EPA requests that Illinois EPA submit a plan for designing and implementing this additional remedial work with EPA funding.**

#### Recommendations in the 2019 Five-Year Review

EPA has completed three Five-Year Reviews at the Jennison-Wright site, in 2009, 2014, and 2019. The next Five-Year Review is due on September 30, 2024. Recommendations in the most recent Five-Year Review included:

- Implement environmental covenants under the Illinois UECA, as required by the ROD.
- Develop and implement an LTS Plan to include procedures for monitoring and tracking compliance with existing ICs, communicating with EPA, and providing an annual certification to EPA that the ICs remain in place and are effective.
- Conduct a review to determine if there is a potential for vapor intrusion and if collection of soil vapor samples is required.
- Define off-site migration of contaminated groundwater to the west.
- Evaluate groundwater data to determine if any additional remedial actions should be taken to increase the rate of groundwater cleanup and/or to address off-site migration of contaminated groundwater.
- Conduct a risk evaluation to determine if long-term protectiveness is compromised due to the change in the dioxin non-cancer toxicity factor.
- Conduct additional sampling to define the extent of dioxin-contaminated soil in the alley.

- Determine if the EPA screening level for residential use or commercial/industrial use should be applied to the results of soil sampling in the alley and if soil excavation is required in this area.
- Review recommendations for additional soil excavation made by Illinois EPA contractor and determine if additional excavation is necessary.
- If additional soil excavation or additional remedial action related to groundwater is necessary, prepare an ESD and/or ROD Amendment to document the change(s) in the remedy.

**EPA requests that Illinois EPA submit an outline for how this recommended work will be conducted, the estimated timeline, and the timing and amount of funding that will be required.** Note that the first bullet item in the above list, implementation of institutional controls, was discussed in the 1999 ROD and in the 2005 and 2009 ESDs.

If you have any questions, please contact Mary Tierney, Remedial Project Manager, at (312) 886-4785 or [tierney.mary@epa.gov](mailto:tierney.mary@epa.gov).

Sincerely,

4/9/2020

X



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Timothy J. Fischer, Chief

Remedial Response Branch 2

Signed by: TIMOTHY FISCHER

cc: Christopher Hill, Illinois EPA (via email only)  
Brian Conrath, Illinois EPA (via email only)  
Donald Bruce, U.S. EPA (via email only)  
Richard Clarizio, U.S. EPA (via email only)  
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